

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

THELMA JONES, PRIYIA LACEY, FAISA
ABDI, ALI ALI, RUKIYA HUSSEIN, LUCIA
PORRAS, DAVID TROTTER-FORD, AND
SOMALI COMMUNITY RESETTLEMENT
SERVICES, INC.,

Plaintiffs,

v.

CITY OF FARIBAULT,

Defendant.

Case No. 18-CV-01643 (JRT/HB)

**JOINT STIPULATION TO
EXTEND DISCOVERY
DEADLINE**

The parties jointly move the Court for an order extending by the deadlines for fact discovery; non-dispositive motions; and expert-related motions. As grounds for this Stipulation, the parties state:

1. The Court issued a scheduling order on September 25, 2018 setting a deadline of June 19, 2019 for the completion of fact discovery. ECF No. 21.
2. Pursuant to a joint stipulation to extend the fact discovery deadline, the Court, by order dated June 6, 2019, extended that deadline to June 28, 2019. ECF No. 69.
3. As of June 28, 2019, Plaintiffs have taken fourteen depositions and Defendant has taken eight depositions.
4. However, a dispute has arisen on whether Plaintiffs may re-open its

deposition of certain witnesses designated by Defendant to testify on its behalf under Fed. R. Civ. P. 30(b)(6).

5. In addition, since June 20, 2019, Defendant has produced approximately 3,000 pages of additional documents.

6. Further, Defendant's proposed expert is unable, due to medical reasons, to be deposed before August 1, 2019, the current deadline for expert discovery.

7. Accordingly, in order to provide sufficient time for the parties to attempt to resolve their dispute under Fed. R. Civ. P. 30(b)(6) and for Plaintiffs to (i) review Defendant's recent productions; (ii) decide whether to attempt to re-open depositions or request new ones in light of those productions, and (iii) depose Defendant's proposed expert, the parties jointly request, pursuant to MN Local Rule 16.3, that the case schedule be amended as follows:

- a. August 2, 2019: Close of fact discovery;
- b. August 2, 2019: deadline for non-dispositive motions;
- c. September 6, 2019: deadline for expert discovery; and
- d. September 20, 2019: deadline for expert-related motions

Dated: June 28, 2019

Respectfully submitted,

AMERICAN CIVIL LIBERTIES
UNION FOUNDATION

/s/ Alejandro Ortiz

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